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Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Sir

Consultation Paper: National Electricity Amendment (Publication of Zone Substation Data) Rule 2013

Thank-you for the opportunity to provide input to the Consultation Paper *National Electricity Amendment (Publication of Zone Substation Data) Rule 2013*, released on 26 April 2013 by the AEMC (the "Consultation Paper").

Aurora Energy Pty Ltd, ABN 85 082 464 622 (Aurora) is an incorporated, State Government owned fully integrated energy and network business, with complementary activities in telecommunications and energy-related technologies. Aurora provides electricity generation, retail and distribution services to more than 270,000 customers in the Tasmanian jurisdiction. In this document, reference to Aurora should be taken as reference to Aurora in its capacity as the provider of distribution network services licensed by the Regulator under the *Electricity Supply Industry Act 1995* (Tas).

Aurora understands that the rule proponent seeks to require Distribution Network Service Providers (DNSPs) to publish historical market-interval demand data for their zone substations to enable stakeholders to undertake econometric modelling and to "check and challenge AEMO processes".

The Consultation Paper seeks information from DNSPs to inform the AEMC's decisions in the rule making process. For a range of reasons, both historical (for example, the asset boundaries between transmission and distribution systems) and current (the reform of the Tasmanian electricity industry), Aurora is not in a position to provide detailed responses to the questions in the Consultation Paper. Nonetheless, Aurora considers that the following information is of relevance to the discussion.

In 1998, on disaggregation of the Hydro-electric Corporation into generation, transmission, distribution and retail businesses in preparation for entry to the National Electricity Market, the upper limit for a distribution voltage was set at 88 kV, which is recognised in rule 9.48.5 of the National Electricity Rules. This had the effect of making the asset boundaries between transmission and distribution in Tasmania at the load side of the TNSP-owned feeder circuit breakers. Aurora takes supply from the TNSP at either sub-transmission voltages (generally 44 kV or 33 kV) to supply its zone substations, or at distribution voltages (22 kV or 11 kV) for its distribution feeders.

Aurora has 12 zone substations, where "zone substation" is as defined in the NER, being supplied by sub-transmission. Aurora does not possess half-hourly interval load data for its zone substations.

Aurora is unconvinced that the publication of zone substation data will be of use in the Tasmanian jurisdiction – all but two zone substations are in the greater Hobart area, but all customers within the greater Hobart area do not necessarily take supply through

a zone substation. In the Tasmanian context, given the non-standard asset boundary, Aurora suggests that the appropriate data for econometric modelling is that appertaining to the transmission terminal substations.

In relation to confidentiality, the configuration of Aurora's distribution system means that at least one large customer will be identifiable through access to zone substation data – aggregation of zone substation data will not remedy this issue.

If you have any questions, please address them to the contact noted above.

Yours faithfully



Anton Voss

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